

Teeth Shaving Policy

US FED COURT PUERTO RICO

Verified COMPLAINT

EMMETT CALDWELL plaintiff

vs

EXAVIER BECERRA;

DEPARTMENT OF HEALTH AND HUMAN SERVICES;

BLUE CROSS BLUE SHIELD;

TRIPLE S ~~INSURANCE~~ MANAGEMENT CORPORATION

HEALTHCARE; DENTIST NAZARIO;*

DENTAL ASSISTANT (unidentified) JUNANA DOE defendants.

RECEIVED AND FILED

CLERK'S OFFICE USDC PR

2024 JUN 21 AM 8:23

24-cv-1279 SCC

Jurisdiction US Government Defendant USC 42 1983 over 75.0000

THE FOLLOWING IS SWORN TRUE UNDER LAWS AND OATH AND PENALTY OF PERJURY AFFIDAVIT

THIS ACTION IS DUE TO UNAUTHORIZED DENTAL SHAVING DRILLING DAMAGE
Cause of Action PLAINTIFFS 7 TEETH DRILLED CAUSING SEVERE EXTREME PAIN SUFFERING

A) 12/28/23 PLAINTIFF A REFORMA ~~WILL~~ ~~SS~~ COVERED PATIENT HAD 8 TEETH DRILLED SHARPENED UNNECESSARILY BY HEALTH CARE PROs JUANA DOE UNIDENTIFIED DENTAL ASSISTANT INTENTIONALLY DAMAGED TO CAUSE PERMANENTLY PAIN AND INJURYS LEADING TO TEETH SURGERY EXTRACTIONS DIRECTLY PROXIMATELY DUE TO FAILURE TO ORDER A NO DENTAL SHAVING POLICY BY HEALTH AND HUMAN SERVICES AND ITS DIRECTOR EXAVIER BECERRA

APPROXIMATELY

Aa) DECEMBER 28 2023 PLAINTIFFS 7-8 TEETH WERE IRREPARABLE DAMAGED BY UNNEEDED DENTAL SHAVING BY PRO HEALTHCARE DENTAL ASSISTANT JUANA DOE USING DENTISTS DRILL TO SHAVE OFF SHARPEN TEETH TOPS AND ENAMAL AFTER DENTIST LEFT SHARPENING PLAINTIFFS 7-8 TEETH MALICIOUSLY FOR NO LEGAL REASON CAUSING PERMANENTLY INJURYS AND INTENSE CONSTANT PAINS AND STARTING KNOWN PROCESS OF TEETH DEGRADATION AND LOSS REQUIRING 8 SURGICAL AND DENTAL PROCEDURES APPROX \$40000.00

Aa) ALL DEFENDANTS ARE GROSS NEGLIGENCE BY RECKLESS FAILURE TO HAVE A 'NO DENTAL SHAVING' POLICY TO PREVENT FORSEEABLE INJURYS TO PREVENT PLAINTIFFS PERMANENT INJURYS TEETH PAINS AND PAIN ON EATING BY FORSEEABLE NOTORIOUS DENTAL TEETH SHAVING VIOLENCE BY DRILLING AWAY TOOTH AND ENAMAL OF NON TREATED TEETH BY DENTAL ASSISTANT JUANA DOE UNRELATED TO TEETH DENTIST IS TREATING AND ARE JOINTLY SEPERATELY LIBAL FOR PLAINTIFFS INJURYS

Ab) HEREIN AFTER RESTATED BY WORDS THE DEFENDANTS ARE 1) EXAVIER BECERRA 2) DEPARTMENT OF HEALTH AND HUMAN SERVICES; 3) BLUE CROSS BLUE SHIELD; 4) TRIPLE S INSURANCE CO; 5) HEALTH CARE PRO; 6) DENTIST NAZARIO; 7) JUANITA DOE (WHO MALICIOUSLY "DENTAL SHAVED" DRILLING PLAINTIFFS 7-8 TEETH CAUSING FORSEEABLE AND INTENDED PERMANENT DAMAGES AND SEVERE CONSTANT TEETH PAIN AND SUFFERING REQUIRING PUNITIVE DAMAGES AS A DETERANT

TRIPLE S MANAGEMENT CORP IS HEREIN AFTER RESTATED BY WORD TRIPLES

Ac) ALL DEFENDANTS ALLOWED FORSEEABLE HEINOUS TORTUROUS VIOLENT "DENTAL SHAVEING" DRILLING BY FAILING TO PROHIBIT IT FAILED TO PROPERLY TRAIN AND SUPERVISE JUANA DOE IGNORED FORSEEABLE HARMS SHE INFLICTED PLAINTIFF SUFFERED AND KNEW OR SHOULD HAVE KNOWN AND ANTICIPATED THE FORSEEABLE INJURYS AND HARMS PLAINTIFFS TEETH SUFFERED FAILING TO HAVE POLICY PREVENTING DENTAL SHAVING

Ad) ALL DEFENDANTS RECKLESSLY IN GROSS NEGLIGENCE DIRECTLY PROXIMATELY CAUSED PLAINTIFFS TEETH INJURYS BY POLICY NOT PROHIBITING UNNEEDED TEETH SHAVING DRILLING RECKLESSLY BY UNSUPERVISED NEGLIGENTLY TRAINED DENTAL ASSISTANT TEETH OTHER THAN THOSE DENTIST SPECIFIED AND INTENDED MIGHT BE ALSO DRILLED BY IMPROPERLY TRAINED AND UNSUPERVISED DENTAL ASSISTANT IF NO POLICY TO SPECIFICALLY PROHIBITED ADDITIONAL DRILLING DUE TO ALL DEFENDANTS GROSS NEGLIGENCE RECKLESS DISREGARD OF HARMS

Ae) PLAINTIFF WAS THE ONLY NON PUERTO RICAN PATIENT AND HIS 7-8 TEETH TOPS WERE INTENTIONALLY SHARPENED DOWN TO CHRONIC TOOTH PAIN AREA ESPECIALLY ON COLD AIR OR FOOD AND WALKING BY JUANITA

DOE PERMANENTLY DESTROYING TOOTH AND ENAMAL INTENTIONALLY MALICIOUSLY

A1) AS A DIRECT RESULT PLAINTIFFS 7-8 TEETH BEING UNNECESSARILY SHAVE SHARPENED DRILLED NONE WHICH WERE SUBJECT OF DENTIST PROCEEDURE. ON ONE UPPER TOOTH # PLAINTIFF SUFFERS SEVERE UNBEARABLE CONSTANT NERVE AND 7 TEETH PAIN ON WALKING EATING ALSO DRINKING CHILLED OR HOT ALSO REGULAR TEMPERATURE FOOD

A2) ALL DEFENDANTS GROSS NEGLIGENCE RECKLESS IGNOREING FORSEEABLE PROBABLE HARM BY NOT HAVING A POLICY OF PREVENTING TEETH SHAVING A KNOWN PRACTICE DE FACTO AUTHORIZED JUANA DOE TO DAMAGE PLAINTIFFS TEETH NOT SUBJECT OF DENTISTS PROCEEDURE CAUSEING PERMANENT LOSS OF TOOTH AND ENAMAL AND RESULTANT SEVERE PAINS AND BEGINNING OF CERTAIN TEETH DEGENERATION AND NERVE DAMAGES REQUIREING SURGERY AS PLAINTIFF SUFFERED AND SUFFERS PERMANENTLY AND WILL SUFFER COSTLY DENTAL SURGERY

B) ALL DEFENDANTS ARE RESPONDANTS SUPERIOR LIBAL FOR FAILING TO HAVE NO TOOTH SHAVING POLICY AND TO PROPERLY TRAIN AND SUPERVISED DENTAL ASSISTANT JUANA DOE WHO IRREPARABLY DAMAGED PLAINTIFFS TEETH INTO PERMANENT PAIN BY DRILLING AWAY TEETH AND ENAMAL IRREPARABLY DE FACTO DENTAL VIOLENCE REQUIREING TITLE 18 DETERMENT DAMAGES

C) PLAINTIFF INFORMED DENTIST IN PRESENCE OF DENTAL ASSISTANT JUANA DOE HE WAS OF CHRISTIAN SCIENCE RELIGION THAT DID NOT ALLOW INJECTIONS OR SURGICAL PROCEEDURES AS ROOT CANAL

CLAIM FOR RELIEF 17 MILLION AND A ORDER DEFENDANTS NO DENTAL SHAVING POLICY BE IMPLEMENTED

Cause of Action

1) DEPARTMENT OF HEALTH AND HUMAN SERVICES IS RESPONDANT SUPERIOR LIBAL FOR PLAINTIFFS INJURYS AND PAIN FAILING DUTY OWED BY NOT PROPERLY TRAINING AND SUPERVISING ALL DEFENDANTS IT CONTRACTS SUPERVISES AND MANAGES AS MEDICAIRE MEDIACAD THAT CONTRACTS BLUE CROSS BLUE SHIELD WHICH SUBCONTRACTS TRIPLE SSS HEALTHCARE WHICH CONTRACTED HEALTH CARE MED DENTIST NAZAERO ALL WHO BY GROSS NEGLIGENCE RECKLESS DISREGARD OF FORSEEABLE HARMS DIRECT PROXIMATELY CAUSED PLAINTIFFS INJURYS ALL ARE DEFENDANTS WHO FAILED FORSEEABLE DUTY TO PROPERLY TRAIN AND SUPERVISE TO PREVENT IRREPARABLE HARM BY ALLOWING DENTAL ASSISTANT TO DRILL AWAY IRREPLACEABLE TOOTH AND ENAMAL TEETH NOT SUBJECT OF DENTISTS PROCEEDURE WHICH FORSEEABLE WOULD CAUSE PLAINTIFFS SEVERE CONSTANT PAIN PERMANENT TEETH AND EVENTUALLY GUM INJURYS

1A) PLAINTIFF WAS SUBJECT OF HEINOUS MALICIOUS DENTAL TORTURE INVOLVING DRILLING OFF TOP OF 7 TEETH TO REMOVE TOOTH AND ENAMAL WHICH DRILLING WAS DE FACTO INTENDED DAMAGES FOR NO LEGAL PURPOSE WITH DRILL WAS GUARANTEED TO EXPOSE THE NERVE TO TORTUOUS PAIN FROM COLD FOOD DRINK AND AIR KNOWN TO LEAD TO TOOTH REQUIREING ROOT CANAL PROCEEDURE EVENTUALLY ONLY POSSIBLE MOTIVE

1B) PLAINTIFF WENT TO HEALTH PRO MED 2020 AVE BORINQUEN FOR DENTAL CHECKUP ON OR ABOUT DEC 28 2023 A MEDICAIDE MEDICARE TRIPLE SSS HEALTH PROVIDER WITHOUT ANY TOOTH PAIN BUT LEFT WITH PAIN DIRECT PROXIMATELY DUE TO DENTIST NAZAERO WHO EXAMINED X RAYED MY TEETH THEN STARTED A UPPER TOOTH TEETH REPAIR PROCEEDURE THEN LEFT JUANA DOE TO COMPLETE TREATMENT FAILING DUTY OWED TO PREVENT DRILLING OF TEETH NOT PART OF DENTISTS TREATMENT IN GROSS NEGLIGENCE OF FORSEEABLE HARMS DIRECT PROXIMATELY CAUSEING PERMANENTLY IRREPARABLE INTENSE PAIN DUE TO TOPS OF 5 UPPER AND 2 LOWER TEETH TO BE DRILLED OFF INTO SHARP SHAPE DESTROYING TOOTH AND ENAMAL (exhibit)

1C) ALL THE DEFENDANTS RESTATED INCORPORATED HERE BY REFERENCE FAILED FORSEEABLE DUTY OWED TRAIN AND SUPERVISE DENTAL TECHNICAN JUANA DOE WHO AFTER DENTIST LEFT DRILLES AWAY TOOTH BONE AND ENAMAL OF TOPS OF FIVE TEETH AND TWO BOTTOM INTO SHARPENED ANIMAL LIKE EDGE DESTROYING TEETH AND ENAMAL OF TEETH DENTIST DID NOT INTEND TO TREAT DIRECT PROXIMATE CAUSE OF SEVERE CONSTANT UNBEARABLE TEETH PAIN AND BREAKAGE OF LOWER TOOTH #

1D) DENTIST NAZARRO AND ALL DEFENDANTS FAILED TO PROPERLY TRAIN AND SUPERVISE DENTAL ASSISTANTS WHO FOR THE BENEFIT OF ALL DEFENDANTS DO EXTRA DENTAL WORK AFTER DENTIST LEAVES THEM WITHOUT

LIMITING INSTRUCTIONS DRILLED ALL APPROX 6 UNAFFECTED TEETH PERMANENTLY DAMAGING ALL

1E) AS A DIRECT PROXIMATE RESULT OF ASSISTANTS DRILLING OFF MY APPROX 7 TEETH AND ENAMAL ARE IRREPAIRABLE DAMAGED AND DESTROYED CANNOT BE REPLACED

1F) DOCTORS HOSPITAL PRESCRIBED PAIN MEDICATION DUE TO PLAINTIFFS TEETH EXTREME PAINS DIRECTLY PROXIMATELY CAUSED BY GROSS NEGLIGENT MALICIOUS HEINOUS DECEITFUL TRIPLE SSS DENTAL CARE

1G) IT IS 330 am AND I CANT SLEEP DUE TO CONSTANT EXTREME PAIN IN UPPER AND LOWER DRILLED TEETH DIRECT PROXIMATE CAUSED BY ALL DEFENDANTS GROSS NEGLIGENCE

1H) DR PRESCRIBED PAIN MEDICATION DUE TO CONSTANT PAINFUL TEETH PAIN DIRECT PROXIMATELY COMPLAINED DRILLING CAUSED

1I) BLUE CROSS BLUE SHIELD CONTRACTED WITH TRIPLE SSS TO PROVIDE THE COMPLAINED INJURIOUS DENTAL TREATMENT DAMAGES

1J) THERE WAS NO REASON TO DRILL AWAY TOP OF THE 6-7 TEETH BONE AND ENAMAL EXCEPT TO MALICIOUSLY FORSEEABLE CAUSE IRREPAIRABLE PERMANENT HARM AND TORTUOUS TOOTH PAIN BEING SUFFERED

1K) DEPARTMENT OF HEALTH AND HUMAN SERVICES IS IN CHARGE OF MEDICARE THAT CONTRACTED TRIPLE S HEALTH THAT CONTRACTED HEALTH PRO MED ALL LIBAL FOR FAILING TO TRAIN AND MONITOR DENTIST AND DENTAL ASSISTANT TO PREVENT UNNEEDED DRILLING OF PLAINTIFFS TEETH DIRECT PROXIMATE CAUSE OF IRREPAIRABLY DAMAGEING TEETH AND ENAMAL AND SEVERE TEETH PAINS

1L) DAMAGE DEFENDANTS CAUSED TO PLAINTIFFS TEETH BY UNNEEDED DRILLING CANNOT BE RESTORED TO PRE DAMAGE CONDITION PERMANENT PAIN IS DIRECT PROXIMATE RESULT THEREOF AND ACCELERATED DETERIORATION LEADING TO EVENTUAL TEETH LOSS

1M) HEALTH CARE PRO JUANNA DOES DENTAL DRILLING WAS FOR THE BENEFIT OF THE DEFENDANTS FORSEEABLE TO REQUIRE PLAINTIFF TO RETURN TO CAUSE ADDITIONAL BILLING TO MEDICARE MEDICAID FINANCIAL BILLING

1N) PARAGRAPH A RESTATED INCORPERATED HERE BY REFERENCE

1M) PARAGRAPH Aa RESTATED INCORPERATED HEREIN BY REFERENCE

1N) PARAGRAPH Ab RESTATED INCORPERATED HEREIN BY REFERENCE

1O) PARAGRAPH A c RESTATED INCORPERATED HERE BY REFERENCE

1P) PARAGRAPH Ad RESTATED INCORPERATED HEREIN BY REFERENCE

CLAIM FOR RELIEF

17 MILLION AND A ORDER NO DENTAL SHAVING POLICY BE IMPLEMENTED

CAUSE OF ACTION

1Q) ON OR ABOUT FEBRUARY 8 I WENT TO THE DENTIST FOR A CHECK UP AT THE TRIPLE SSS MEDICAL PROVIDER PRO HEALTH CARE DESIGNATED LOCATED AT 2020 AVE BORIQUEN TRIPLE S HEALTH CARE DIRECTLY PROXIMATELY CAUSED PERMANENTLY INJURYS AND PAIN BY GROSS NEGLIGENCE POLICY ALLOWING DENTADRIILL SHAVING OF TEETH BY DENTAL ASSISTANT JUANA DOE TO DENTAL SHAVE OFF AND SHARPEN TOP OF MY 6 TOP TEETH AND 2 LOWER (exhibit) RESPONDANT SUPERIOR DONE FOR TRIPLES BENEFIT TO ACCELERATE & CAUSE TOOTH DAMAGE DELAY REQUIRING ADDITIONAL DENTAL SERVICES & BILLING

1R) I TRUSTED THE ADVERTISED TRIPLE SSS PROFESSIONAL REPUTATION TO MY DETRIMENT ALLOWING THE DENTIST AND DENTAL ASSISTANT TO DO WHATEVER DENTAL PROCEDURES NECESSARY RESULTING IN CONSTANT PAINFUL TEETH INJURYS DUE TO UNNEEDED DENTAL DRILLING & SHAVING 7 TEETH NOT PRIOR NEEDING ANY DENTAL TREAT 3MENT NOW REQUIRING \$25-50,000.00 DENTAL TREATMENTS TO REPAIR PERMANENT IRREVERSABLE INJURY DAMAGES

2) X RAYS WERE TAKEN AND THE DENTIST EXAMINED MY TEETH AND STARTED PROCEEDURE TO ADD A PASTE TO MY UPPER TOOTH CAVITY AND DRILL CAVITY AREA ONLY 1 TOOTH WAS TO BE TREATED # 6 (EXH. b.1)

3) THE DENTIST ASKED IF I WANTED TO BE SEDATED WHICH SEEMED ODD SINCE IT WAS NO INJECTION PROCEEDURE

4) THE HEALTH PRO MED DENTIST (2020 AVE BORIQUEN) DENTIST NAZARIO STARTED USEING A DRILL THEN LEFT DRILLING ECT TO THE TECHNICAN A FEMALE TO DO THE REST AND LEFT THE DENTAL AREA PERMENANTLY

5) I TRIED TO NOT MOVE AS I COULD NOT SPEAK ECT AFTER DRILLING STARTED

6) I TRUSTED THAT THE DENTAL TECHNICAN WAS PROPERLY INSTRUCTED TRAINED AND SUPERVISED BY THE DENTIST AND TRIPLE SSS
TO MY DETRIMENT DUE TO TRIPLE SSS AND HEALTH & HUMAN SERVICES ADVERTISED
SAFE TREATMENT MIS REPRESENTATIONS

7) I WAS IN A PANIC EXTREEM DURESS STATE DUE TO THE UNCOMFORTABLE CLAMPED OPEN MOUTH BRIGHT LIGHT AND DRILLING NOISE HAVING TO NOT OBJECT TO DENTAL PROCEEDURE AS CUSTOMARY

8) THE DENTAL ASSISTANT DRILLED MY TEETH AWAY INTO A SHARP KNIFE LIKE PATTERN ALL 5 OF THE MY TEETH OFF AT THE TOP AND TWO LOWER TEETH SO MY TEETH ARE NOW TWO COLORED WHITE WHERE DENTAL BONE AND ENAMAL DRILLED AWAY

9) I WAS VERY ALARMED WHEN THE DENTAL ASSISTANT PUT HEAVY PRESSURE ON LOWER TOOTH THAT BROKE OFF HOURS LATER AND RETURNED FOR EMERGENCY APPOINTMENT I MISSED

10) I INFORMED THE RECEPCTIONST MY TEETH WERE DRILLED INTO DOG LIKE SHAPE AND HURT AND LOWER BROKE AND I NEEDED 2ND EMERGENCY APPT BUT SHE SAID YOU HAVE REGULAR APPT THAT AFTER I MISSED

11) I INFORMED TRIPPLE SSS BUT THEY DID NOT TAKE COMPLAINT ON TWO OCCASSIONS PLAZA OFFICE IN MARCH APRIL I MADE COMPLAINT AND A PHOTO GOT A CALL FROM TRIPLE SSS INVESTIGATOR

12) DIRECT PROXIMATE CAUSE OF INJURYS AND PAIN IS TRIPLE SSS RESPONDANT SUPERIOR FAIED DUTY OWED TO PROPERLY TRAIN AND SUPERVISE DENTIST AND DENTAL ASSISTANT IN GROSS NEGLIGENCE AND RECKLESS DISREGARD OF THE FORSEEABLE HARMS FAILED TO TRAIN AND SUPERVISE THEIR DENTIST AND ASSISTANT TO PREVENT MY TEETH BEING DRILLED THAT WERE NOT PART OF THE PROCEEDURE CAUSEING EXTREEM UNBEARABLE PERMENANTLY IRREPAREABLE Injury AND CONSTANT EXCRUCATEING TEETH PAINS AND SUFFERING

12A) PARAGRAPH 14 IS RESTATED INCORPERATED HERE BY REFERENCE

12C) PARAGRAPH A RESTATED INCORPERATED HERE BY REFERENCE

12D) PARAGRAPH Aa RESTATED INCORPERATED HERE BY REFERENCE

12E) PARAGRAPH Ab RESTATED INCORPERATED HERE BY REFERENCE

12F) CLAIM FOR RELIEF 10.5 MILLION DOLLARS

CAUSE OF ACTION

13) BLUE CROSS BLUE SHIELD CONTRACTED WITH TRIPLE S TO PROVIDE DENTIST SERVICE PER PLAINTIFFS PLAN COVERAGE DIRECT PROXIMATE CAUSE OF PLAINTIFFS INJURYS FAILING DUTY OWED TO FORBID DENTAL SHAVING DRILLING ON UNAFFECTED TEETH CAUSING SEVERE PAIN & SUFFERING

13A) BLUE CROSS BLUE SHIELD IS RESPONDANT SUPERIOR LIBAL FOR FAILURE TO PROPERLY TRAIN AND SUPERVISE ALL DEFENDANTS THAT FOR THIER BENEFIT PROVIDED COMPLAINED DENTAL TREATMENT AND DAMAGES COMPLAINED DIRECT PROXIMATE CAUSE OF PLAINTIFFS INJURYS AS STATED IN PARAGRAPH RESTATED BY REFERENCE

13B) BLUE CROSS BLUE SHIELD FAILED DUTY OF CARE OWED AND ADVERTISED BY ALLOWING UNNEEDED TEETH DRILLING RECKLESSLY IN GROSS NEGLIGENCE HENIOUS DISREGARD OF PROBABLE HARM DIRECTLY PROXIMATELY ALLOWED AND CAUSED PLAINTIFFS 7 UNAFFECTED TEETH TO BE DRILLED INTO SHARP DOG TEETH FORSEEABLY

CAUSEING PERMENANTLY EXCRUCATEING PAIN AND SUFFERING A PRACTICE TO ACCEILLERATE NEED
 FOR ADDITIONAL DENTAL BILLING + VISITS TO DENTISTS
 13C) BLUE CROSS BLUE SHIELD HAD PRIOR NOTICE OF DENTIST PROVIDERS DAMAGING TEETH BY UNEEDED DRILL SHAVING
 PROCEEDURES AND FAILED DUTY OWED TO PREVENT INJURYS COMPLAINED IN PARAGRAPH A RESTATED HERE BY
 REFERENCE GROUNDS FOR PUNETIVE DAMAGES

13D) PARAGRAPH A RESTATED INCORPERATED HEREIN BY REFERENCE

13E) PARAGRAPH Aa RESTATED INCORPERATED HEREIN BY REFERENCE

CLAIM FOR RELIEF 17.5 MILLION AND A MOTION FOR PUNETIVE DAMAGES

CAUSE OF ACTION

14) PARAGRAPH A RESTATED INCORPERATED HEREIN BY REFERENCE

14A) PARAGRAPH Aa RESTATED INCORPERATED HEREIN BY REFERENCE

14B PARAGRAPH RESTATED INCORPERATED HERE BY REFERENCE
 14C PARAGRAPH RESTATED INCORPERATED HERE BY REFERENCE

15B) TRIPLE SSS HEALTH CARE IS RESPONDANT SUPERIOR DIRECT PROXIMATELY LIBAL FOR ALLOWING ITS
 CONTRACTED HEALTH CARE PRO AND DENTIST NAVZERO AND DENTAL TECHNICAN JUANA DOE TO UNNECESSARILY
 IRREPARABLY DRILL APPROX 5 UPPER AND 2 LOWER TEETH DESTROYING TOOTH AND ENAMAL IRREPARABLY
 DENTAL SHAVING FORSEEABLE FOR BENIFT TO CAUSE ADDL VISITS + BILLING
 15C) DENTIST NAVRIO EXAMINED MY TEETH AND MADE XRAYS AND FILLED A CAVITY AND LEFT LETTING JUANA DOE
 CONTINUE DRILLING WITHIUT ANY LIMITING INSTRUCTIONS IN GROSS NEGLIGENCE RECKLESS DISREGARD OF
 FORSEEABLE HARMS DUE TO FAILURE TO TRAIN AND SUPERVISE TECHNICAN LEFT ME IN THE CARE OF THE FEMALE
 DENTAL TECHNICAN

WHO DRILLED THE TOP OF MY FIVE TEETH AWAY INTO A SHARP ANIMAL LIKE POINTED SHAPE PERMANANTLY
 DESTROYING THE TEETH AND ENAMAL AND THEN DRILLED HARD 1 LOWER TOOTH CAUSEING IT TO BREAK IN TWO
 (EXHIBIT.)

DIRECT PROXIMATE CAUSE OF PERMANT IRRPARABLE INJURYS AND EXTREEM CONSTANT UNBEARABLE TEETH
 PAINS AND SUFFERING, HEADACHES REQUIRING PAIN MEDICATION + DENTAL
 EXPENSES

15D) PARAGRAPH 1 RESTATED INCORPERATED HERE BY REFERENCE

16) PARAGRAPH 2 RESTATED INCORPERATED HEREIN BY REFERENCE

17) PARAGRAPH 3 RESTATED INCORPERATED HEREIN BY REFERENCE

18) PARAGRAPH 4 RESTATED INCORPERATED HERE BY REFERENCE

19) PARAGRAPH 5 RESTATED INCORPERATED HERE BY REFERENCE

20) PARAGRAPH 6 RESTATED INCORPERATED HERE BY REFERENCE

21) PARAGRAPH 7 RESTATED INCORPERATED HERE BY REFERENCE

22) PARAGRAPH 8 RESTATED INCORPERATED HERE BY REFERENCE

23) PARAGRAPH 9 RESTATED INCORPERATED HERE BY REFERENCE

24) PARAGRAPH 10 RESTATED INCORPERATED HERE BY REFERENCE

25) PARAGRAPH 11 RESTATED INCORPERATED HEREIN BY REFERENCE

26) PARAGRAPH 12 RESTATED INCORPERATED HEREIN BY REFERENCE

26A) PARAGRAPH A RESTATED INCORPERATED HEREIN BY REFERENCE

26B) PARAGRAPH Aa RESTATED INCORPERATED HEREIN BY REFERENCE

27) CLAIM FOR RELIEF 10.5 MILLION DOLLARS

CAUSE OF ACTION

28) MEDICAIDE MEDICARE IS LIBAL FOR NOT ORDERING A NO DENTAL SHAVING POLICY BY ITS TRIPLE S HEALTH CARE AND HEALTH CARE PRO DENTAL PROVIDER IS LIBAL FOR INJURYS SUFFERED DUE TO PRO HEALTH CARE DENTAL ASSISTANT JUANA DOE UNEEDED DENTAL SHAVING OFF SHARPENING TOPS OF PLAINTIFFS 8 TEETH AFOREMENTIONED IN PARAGRAPH. 14A RESTATED HERE BY REFERENCE

28A)MEDICAIDE MEDICARE GROSS NEGLIGENTLY DIRECTLY PROXIMATELY CAUSED PLAINTIFFS DENTAL INJURYS BY FAILING TO HAVE POLICYS PREVENT DENTAL SHAVING AND SHARPENING TEETH CAUSEING INJURYS SUFFERED

28B) MEDICAIDE MEDICARE HAS IGNORED DUTY OWED TO IMPLEMENT POLICY OF NO DENTAL SHAVING SHARPENING OF TEETH BY ITS HEALTH CARE PROVIDER DESPITE PRIOR NOTICE OF THE PRACTICE IN RECKLESS DISREGARD OF FORSEEABLE HARMS

FAILED DUTY OWED TO PROPERLY TRAIN AND SUPERVISE ITS DE FACTO DENTIST AND DENTAL TECHNICAN JUANNA DOE

28C MEDICAIDE MEDICARE HAS RECIVED PRIOR COMPLAINTS OF ITS SERVICE PROVIDERS AND DENTIST ECT PREFORMING 'DENTAL SHAVING' ON TEETH NOT SUBJECT OF DENTIST TREATMENT UNNEEDED DENTAL PROCEEDURES GROSS NEGLIGENTLY FAIL DUTY OWED RELIED ON FAILING TO PREVENT THE UNEEDED DRILLING DIRECT PROXIMATELY CAUSEING PLAINTIFFS PERMENANTLY IRREPAREABLE INJURYS SUBJECT OF THIS ACTION AND CONSTANT PERMENANTLY EXTREEM UNBEARABLE PAIN PLAINTIFF WILL SUFFER FOR THE REST OF HIS LIFE

28D) MEDICAIDE MEDICARE ALLOWS DENTAL SHAVING POLICYS UN NEEDED DENTAL DRILLING DAMAGES GROSS NEGLIGENTLY RECKLESS MALISHOUSLY DIR XT CAUSE OF PLAINTIFFS INJURYS

29) PARAGRAPH. A RESTATED INCORPERATED HERE BY REFERENCE

30) PARAGRAPH Aa RESTATED INCORPERATED HEREIN BY REFERENCE

31) PARAGRAPH 3 RESTATED INCORPERATED HEREIN BY REFERENCE

32) PARAGRAPH 4 RESTATED INCORPERATED HERE BY REFERENCE

CLAIM FOR RELIEF
17 MILLION DOLLARS

WHEREFORE

PLAINTIFF DEMANDS 17.5 MILLION ALSO APPROPRIATE ORDERS ...

DATED 4/18/24


PLAINTIFF Emmett Caldwell
POB 16309 San Juan PR 00908 biz2dev777@gmail.com